

REMARKS

Applicant has studied the Office Action dated January 27, 2005. It is submitted that the application, after this amendment, is in condition for allowance. Specifically, by this amendment, Claims 1, 4, 10, 13, 18, and 21, have been amended, Claim 20 has been canceled without prejudice, and new Claim 22 has been added. After this amendment, Claims 1-19 and 21-22 remain pending. Reconsideration, reexamination, and allowance of the pending claims in view of the above amendment and the following remarks are respectfully requested.

**Rejection under 35 U.S.C. §103(a) over Mark in view of Hersh
and further in view of Pieterse(Claims 1-4, 7, and 21)**

(1-10) The Examiner rejected Claims 1-4, 7, and 21, under 35 U.S.C. § 103(a) as being unpatentable over Mark, U.S. Patent No. 5,583,933, in view of Hersh, U.S. Patent No. 5,386,479, and further in view of Pieterse, U.S. Patent No. 5,583,933.

Applicant has amended independent claim 1, from which claims 2-4, and 7 depend, to more clearly and distinctly claim Applicant's invention. Specifically, independent claim 1, and all dependent claims depending therefrom, respectively, now more clearly recite

"each of the plurality of acoustic transducers being oriented outward of the one side of the secure access card **for generating, from each of the plurality of acoustic transducers, the tone audio output external to the one side of the secure access card.**"

Additionally, independent claim 1 now more clearly and distinctly recites "the secure access card being of size and form for convenient carrying and use by a user".

Independent claim 21 reciting a secure access device has also been amended

to more clearly and particularly define the claimed invention as follows:

“at least one tone generator for generating tone audio output external from one side of the secure access device, the tone audio output comprising a tone sequence including a first tone and a second tone different from the first tone, and wherein the at least one tone generator comprises a plurality of acoustic transducers being mechanically tuned to oscillate substantially at their mechanical resonant frequency to substantially maximize audio power output from each of the plurality of acoustic transducers being oriented outward of the one side of the secure access device for generating, from a first one of the plurality of acoustic transducers the first tone and from a second one of the plurality of acoustic transducers the second tone, the tone audio output external to the one side of the secure access device, and wherein the secure access device being in a credit card form factor for convenient carrying and use by a user”.

(Emphasis added.)

Support for the amended claim language may be found in the original patent application, as filed. For example, see the specification, on page 8, line 24, to page 9, line 2, (discussing the secure access card being preferably constructed with ISO thickness and with a credit card form factor to enhance the friendly usability by a user typically accustomed to carrying cards in a wallet or purse). Also, see page 10, lines 12-14, (discussing that the card's tone generator can generate multiple tones, such for DTMF communications over a phone line). Further, see page 11, lines 9-17, (discussing how each of the acoustic transducers in a plurality of acoustic transducers is controlled to generate from the plurality of acoustic transducers a variable tone sequence), and continuing on page 11, line 19, to page 12, line 4, (generally discussing the tone audio output from the plurality of acoustic transducers being oriented external from one side of the card and thereby audio coupled to the receiver mouthpiece of a telephone). No new matter was added by the above amendments.

Please note that the plurality of acoustic transducers of the Applicant's claimed invention are mechanically tuned to oscillate about their mechanical resonant frequency to substantially maximize audio power output from each of the plurality of acoustic transducers being oriented outward of the one side of the secure access card for generating, from each of the plurality of acoustic transducers, the tone audio output external to the one side of the secure access card, such as to audio couple tone output audio from each of the plurality of acoustic transducers to the microphone transducer of a telephone. Each acoustic transducer of the plurality of acoustic transducers is oriented outward of one side of the card. Each acoustic transducer generates external from the one side of the card a tone audio output at the maximum audio power output from the particular acoustic transducer at its mechanical resonant frequency range. Two or more of these acoustic transducers can simultaneously generate tone audio output for different tones while each tone is being generated by a respective acoustic transducer at the maximum audio power output from the particular acoustic transducer at its mechanical resonant frequency range.

The claimed invention is very different than Mark's single speaker audio transducer that is operating to cover a wide frequency range. Mark's single speaker is by definition not operating at its mechanical resonant frequency. As acknowledged by the Examiner, the Mark reference does not teach, anticipate, or suggest, a plurality of acoustic transducers. The Mark reference discloses only one transducer (see 114 of FIG. 2 of the Mark reference). This single transducer of the Mark reference operates over a wide frequency range band and is calibrated to operate over this wide frequency band. This wide frequency band operation, to optimally cover audio generation output such as at various frequencies for DTMF generation, etc., with a single transducer (i.e., a speaker), inherently does not operate at substantially the mechanical resonant frequency of the transducer to maximize its audio power output. The single transducer of the Mark reference, therefore, is not tuned to operate at about its mechanical resonant frequency, as recited for amended independent claims 1 and 21. Therefore, it should be clear that Mark's single speaker audio transducer does

not teach or suggest the presently claimed invention.

The presently claimed invention is also very different than Hersh's Helmholtz resonator based loudspeaker box. Hersh is not a tone generator. Hersh provides a wide band intense frequency response audio output. See column 2, lines 24-25. Also, Hersh's plurality of acoustic transducers are located inside a sealed box, where these audio transducers are all oriented inward into a common chamber or Helmholtz resonating cavity that then provides a single port output from the Helmholtz resonating cavity to emit a complex wide frequency band audio output. Hersh does not generate tone audio output, as claimed for the present invention. A Helmholtz resonator does not emphasize a mono tonal frequency audio output. Also, Hersh's wide frequency response sound generator speaker box is large in volume to accommodate the Helmholtz resonating cavity at the frequencies of interest (e.g., about 500 Hz). For example, at 1200 Hz, a Helmholtz resonator cavity would contain a volume of air of .3 meters cubed. That is a very large volume required for the resonator box, which is not feasible to implement in a card size and shape as claimed for the present invention. Hersh's powerful sound generator is made of aluminum or other sheet metal fabrication technique and is used, for example, to test sonic fatigue on airborne vehicles. See column 4, lines 64-68, and column 2, line 64, to column 3, line 5. Hersh's loudspeaker box is not for use in communication with any communication network interface such as a telephone network interface. For example, Hersh's Helmholtz resonator is incompatible with DTMF tone specifications for telephone communications, as recited for dependent claim 2. Therefore, for the reasons discussed above, it should be clear that Hersh's sound generator box does not teach or suggest the presently claimed invention.

Further, the presently claimed invention is very different than Pieterse's single loudspeaker 4 audio output transducer 23, as illustrated in FIGs. 1B, 4, and 5, and with reference to the discussion in column 4, lines 11-15. Note that all other output audio signal generators in Pieterse are described as electronic circuits being found in

an ASIC. See, for example column 7, lines 31-34. Therefore, it should be clear that Pieterse's single loudspeaker 4 audio output transducer 23 does not teach or suggest the presently claimed invention, as recited for independent claims 1 and 21 and for all dependent claims depending therefrom, respectively.

Furthermore, there is no suggestion in either Hersh or Mark for combining Hersh's wide frequency response sound generator speaker box with Mark's single speaker auto-dialer. Hersh does not teach or suggest a tone generator. Hersh provides a wide band intense frequency response audio output. See column 2, lines 24-25. So, Hersh does not generate a tone sequence for delivery via a communication network interface. In particular, Hersh is not for use in a telephone communication network. There is no suggestion in Hersh to apply the teachings to communication over a telephone network interface or to an auto-dialer card application. Additionally, Mark's single speaker auto-dialer does not suggest in any way a benefit for expanding the number of speaker audio transducers. The single speaker operates to generate all of the desired frequencies and the auto-dialer self-adjusts to calibrate its audio output. See for example the Abstract. Therefore, Applicant submits that neither Mark nor Hersh suggest a combination of the two cited references.

Pieterse teaches a similar communication application to Mark's auto-dialer. However, for similar reasons as discussed above with reference to the lack of suggestion for the combination of Hersh with Mark, there is no suggestion in either Hersh or in Pieterse for the combination of the two references. Therefore, Applicant respectfully submits that Hersh's loudspeaker box having wide band intense frequency response audio output can not be properly combined with either Mark's teachings or with Pieterse's teachings to form the basis for the present rejection of the claims. Any possible suggestion as to a combination of the cited references must be found in each of the cited references. It is improper to use Applicant's specification and claims to find a motivation for a combination of cited references.

As claimed in Claims 1 and 21, and for all dependent claims depending therefrom, respectively, the operation of the plurality of transducers at substantially their mechanical resonant frequency and each transducer being oriented outward of one side of the device for the transducer generating tone audio output external to the one side of the device, is a significant advantage that is not taught, anticipated, or suggested by Mark, by Hersh, by Pieterse, or by any of the other cited prior art references, or by any arguable combination thereof. A main advantage is that it allows maximum audio output from each of the plurality of acoustic transducers that are aimed outward from one side of the card for generating tone audio output from each of the plurality of acoustic transducers external to the one side of the secure access card, while providing the secure access card the ability to significantly conserve battery power to generate such audio output and at the same time extending the life of a power source for the card, which is a very desirable feature for consumers. See, for example, the discussion in Applicant's specification from page 11, line 19, to page 12, line 14. The substance of the discussion is set forth below for quick reference.

"Maximizing power output of the tuned transducers 324 is an important feature of the present invention with particular value in applications that utilize audio coupling into a network interface to communicate with the secure access central system. For example, via a telephone station, the universal card 112 can be used to generate tone audio output that is audio coupled to the mouthpiece of a telephone station. Since this audio coupling may be less than perfect in most applications, it is important to transmit maximum audio output power to couple into the telephone mouthpiece receiver in less than ideal conditions. For example, in an airport or other public location where there is significant ambient noise, a user of the universal card 112 may be able to hold the card audio output in close proximity to the telephone mouthpiece and still accomplish a reliable delivery of tone signals via the telephone station to the secure access central system.

The universal card 112 through this novel use of selective tone generation circuits and transducers is able to provide a significant tone audio power output for communication, such as via a telephone network, while minimizing the drain on the internal battery power source of the universal card 112. Additionally, the pulse duration limiter 316 can limit the duration of particular tones to a minimum duration required for

reliable delivery of the tone signal to the secure access central system. By minimizing the tone duration to its absolute minimum for reliable communication, the universal card 112 additionally conserves battery power and thereby extends battery life, which is an important feature desired by most users.”

Therefore, the Examiner’s rejection should be withdrawn and it is respectfully submitted that Claims 1 and 21, and all dependent claims depending therefrom (including dependent Claims 2-4, and 7), respectively, are in condition for allowance.

Additionally, with respect to dependent Claim 4, it has been amended to more clearly recite that each of the plurality of acoustic transducers being located at the one side of the card for audio coupling the tone audio output from each of the plurality of acoustic transducers to a telephone audio receiver. This is an additional limitation that further distinguishes from any of the cited references or a combination thereof.

Furthermore, with respect to dependent Claim 2, it recites in part that the “at least one tone generator generates a tone sequence comprising at least one of dual tone multi-frequency (DTMF) signals, FSK signals, MSK signals, and multitone signals.” Claim 2, depending from Claim 1, also recites that the plurality of acoustic transducers are for generating the tone audio output external to one side of the secure access card. It should be clear that the plurality of acoustic transducers are generating the tone audio output for the tone sequence. The tone sequence, as claimed in Claim 2, is for at least one of DTMF signaling, FSK signaling, MSK signaling, and Multitone signaling. Note that these tone signaling protocols have very precise tone frequency separation and timing requirements. On the other hand, the plurality of acoustic transducers in the Hersh reference, (or in any arguable combination of Hersh with the teachings of Mark or of Pieterse), interoperate with the main chamber (Helmholtz resonant cavity) to generate a wide frequency response sound output from a port of the Helmholtz resonator. This is not a tone audio output. Therefore, Applicant submits that Claim 2 also recites additional limitations that are additionally novel over any combination of the cited references.

Additionally, Applicant respectfully disagrees with Examiner's conclusion that it is well known in the art that a plurality of acoustic transducers be oriented outward of one side of a secure access card. In particular, Applicant respectfully disagrees that Pieterse teaches or suggests a plurality of acoustic transducers oriented outward of one side of a card to generate tone audio from each of the transducers external from the one side of the card. Also, Applicant submits that it is particularly novel, as recited for claim 4, that

each of the plurality of acoustic transducers being oriented outward of the one side of the secure access card and further being located at the one side of the secure access card for audio coupling **the tone audio output from each of the plurality of acoustic transducers directed outward and external to the one side of the secure access card and to a telephone audio receiver** for delivering a tone sequence via a communication network interface comprising a telephone network interface for a publicly switched telephone network (PSTN). Note that none of the cited references nor any combination thereof teaches or suggests a plurality of acoustic transducers audio coupling tone audio output from one side of a card to a telephone audio receiver.

Lastly, Applicant added new dependent Claim 22, that depends from independent Claim 1, to recite the additionally novel claimed feature that the secure access card is in a credit card form factor for convenient carrying and use by a user. As has been discussed above, the Hersh reference teaches and suggests a cube with a large air volume for the Helmholtz resonating cavity, that could not be implemented in a card form factor. In particular, as claimed for claim 22, a credit card form factor clearly precludes the use of any arguable combination of any of the cited references with the Hersh teachings of a plurality of audio transducers inside a cube operating therein with the Helmholtz resonator. Applicant, therefore, submits that neither cited reference nor any combination thereof teaches or suggests the features claimed in Claim 22.

Therefore, the Examiner's rejection of Claims 2-4, and 7 should be withdrawn, and it is respectfully submitted that independent Claims 1 and 21, dependent Claims 2-4, and 7, and new Claim 22 are all in condition for allowance.

Rejection under 35 U.S.C. §103(a) over Mark, in view of Hersh,
and further in view of Pieterse,
and furthermore in view of Paterno (Claim 5)

(11-12) The Examiner rejected Claim 5, under 35 U.S.C. § 103(a) as being unpatentable over Mark, U.S. Patent No. 5,583,933, in view of Hersh, U.S. Patent No. 5,386,479, and further in view of Pieterse, U.S. Patent No. 5,714,741, and furthermore in view of Paterno, U.S. Patent No. 5,636,271.

As explained above, independent claim 1, from which claim 5 depends, has been amended in order to more particularly point out and distinctly claim the Applicant's invention over the Mark reference, the Hersh reference, the Pieterse teachings, any of the other cited references (including the Paterno reference), or any combination thereof.

For similar reasons to those explained above for amended independent claim 1, which will not be repeated again here, dependent Claim 5 distinguishes over the Mark reference, the Hersh reference, and the Paterno reference, and any combination thereof. Neither the Mark teachings, nor the Hersh teachings, nor the Pieterse teachings, nor the Paterno teachings, nor any arguable combination of the four references, teaches, anticipates, or suggests all of the recited elements of Claim 5. Therefore, the Examiner's rejection should be withdrawn and it is respectfully submitted that Claim 5 is in condition for allowance.

Rejection under 35 U.S.C. §103(a) over Mark, Hersh, Pieterse, Paterno, and Fung
(Claim 6)

(13-14) The Examiner rejected Claim 6 under 35 U.S.C. § 103(a) as being unpatentable over Mark, U.S. Patent No. 5,583,933, in view of Hersh, U.S. Patent No. 5,386,479, and further in view of Pieterse, U.S. Patent No. 5,714,741, and further in view of Paterno, U.S. Patent No. 5,636,271, and furthermore in view of Fung, US Publication No. 2001/0052077. As explained above, independent claim 1, from which Claim 6 depends, has been amended in order to more clearly and distinctly claim the Applicant's invention.

For similar reasons to the reasons explained above for amended independent Claim 1, which will not be repeated again here, dependent Claim 6, depending from Claim 1, distinguishes over the teachings of the Mark reference, the Hersh reference, the Pieterse reference, the Paterno reference, and the Fung reference, and any combination thereof. Neither Mark, Hersh, Pieterse, Paterno, nor Fung, nor any arguable combination of the five cited references, teaches, anticipates, or suggests, all of the recited elements of Claim 6 taken as a whole. Therefore, the Examiner's rejection should be withdrawn and it is respectfully submitted that Claim 6 is in condition for allowance.

Rejection under 35 U.S.C. §103(a) over Mark, Hersh, Pieterse,
and Fung (Claims 8-9)

(15-16) The Examiner rejected Claims 8-9 under 35 U.S.C. § 103(a) as being unpatentable over Mark in view of Hersh and further in view Pieterse, and furthermore in view of Fung. As explained above, independent Claim 1, from which Claims 8-9 depend, has been amended in order to more clearly and distinctly claim the Applicant's invention.

For the reasons explained above for amended independent Claim 1, which will not be repeated again here, dependent Claims 8-9 distinguish over the teachings of the Mark reference, the Hersh reference, the Pieterse reference, and the Fung reference, or any combination thereof. Neither Mark, nor Hersh, nor Pieterse, nor Fung, nor any arguable combination of these references, teaches, anticipates, or suggests, all of the recited elements of Claims 8-9 taken as a whole. Therefore, the Examiner's rejection should be withdrawn and it is respectfully submitted that Claims 8-9 are in condition for allowance.

**Rejection under 35 U.S.C. §103(a) over Mark, Hersh, Pieterse,
Fung, and Maes (Claims 10-13, 16-17)**

(17-23) The Examiner rejected Claims 10-13 and 16-17 under 35 U.S.C. § 103(a) as being unpatentable over Mark in view of Hersh, and further in view of Pieterse, and further in view of Fung, and furthermore in view of Maes, U.S. Patent No. 6,016,476.

Independent Claim 10, from which Claims 11-13, and 16-17 depend, has been amended, in similar fashion to amended independent Claim 1, in order to more clearly and distinctly claim the Applicant's invention. Specifically, independent Claim 10, and all dependent claims depending therefrom, respectively, now more clearly recite

"each of the plurality of acoustic transducers being oriented outward of the one side of the secure access card for generating, from each of the plurality of acoustic transducers, the tone audio output external to the one side of the secure access card."

Additionally, independent claim 10 now more clearly and distinctly recites the secure access card "being of size and form for convenient carrying and use by a user".

Support for the amended claim language is similar to that already discussed above with respect to the amendment to Claim 1. No new matter was added.

For similar reasons to the reasons explained above for amended independent Claim 1, which will not be repeated here, amended independent Claim 10 distinguishes over the teachings of the Mark reference, the Hersh reference, the Pieterse reference, the Fung reference, and the Maes reference, and any arguable combination with any of the cited references. Neither Mark, Hersh, Pieterse, Fung, nor Maes, nor any combination of the five cited references, teaches, anticipates, or suggests, all of the recited elements of amended independent Claim 10. Therefore, the Examiner's rejection should be withdrawn and it is respectfully submitted that amended independent Claim 10 is in condition for allowance.

Further, because amended independent Claim 10 distinguishes over the cited references as discussed above, dependent Claims 11-13, and 16-17, which depend from amended independent Claim 10, also distinguish over the cited references. These claims therefore are also allowable.

Additionally, dependent Claim 13 has been amended similarly to amended Claim 4. That is, the claim 13 now more clearly recites that the plurality of acoustic transducers are located at the one side of the secure access card for audio coupling the tone audio output from each of the plurality of acoustic transducers to a telephone audio receiver. This is an additional limitation that further distinguishes from any of the cited references or any combination thereof.

Therefore, the cited references as discussed above, taken either singly or in any arguable combination thereof, do not teach, anticipate or suggest all of the recited elements, taken as a whole, of independent Claim 10, or of dependent Claims 11-13, and 16-17. Therefore, the Examiner's rejection should be withdrawn and it is respectfully submitted that independent Claim 10 and dependent Claims 11-13, and

16-17 are in condition for allowance.

Rejection under 35 U.S.C. §103(a) over Mark, Hersh, Pieterse, Fung, Maes, and Paterno (Claims 14-15)

(24-26) The Examiner rejected Claims 14-15 under 35 U.S.C. § 103(a) as being unpatentable over Mark in view of Hersh, Fung, Maes, and Paterno. As explained above, amended independent Claim 10, from which Claims 14-15 depend, has been amended in order to more clearly and distinctly claim the Applicant's invention.

For the reasons explained above for amended independent Claim 10, dependent Claims 14-15 distinguish over the teachings of the Mark reference, the Hersh reference, the Pieterse reference, the Fung reference, the Maes reference, the Paterno reference, and any arguable combination with any cited reference. Neither of the cited references above, nor any arguable combination thereof, teaches, anticipates, or suggests, all of the recited elements of dependent Claims 14-15 taken as a whole. Therefore, the Examiner's rejection should be withdrawn and it is respectfully submitted that Claims 14-15 are in condition for allowance.

Rejection under 35 U.S.C. §103(a) over Mark, Hersh, Pieterse, and Maes (Claim 18)

(27-28) The Examiner rejected Claim 18 under 35 U.S.C. § 103(a) as being unpatentable over Mark in view of Hersh, Pieterse, and further in view of Maes. Independent Claim 18 has been amended in order to more clearly and distinctly claim the Applicant's invention.

Specifically, independent method Claim 18 has been amended to more clearly recite

"acoustically transmitting by at least one tone generator in the secure access device tone audio output external from one side of the secure access device, the tone

audio output comprising a tone sequence, including a first tone and a second tone different from the first tone, destined for reception across a communication network, the tone sequence corresponding to the stored representation of the user input, wherein the at least one tone generator comprises a plurality of acoustic transducers that are mechanically tuned to oscillate about their mechanical resonant frequency to substantially maximize audio power output from each of the plurality of acoustic transducers being oriented outward of the one side of the secure access device for generating, from a first one of the plurality of acoustic transducers the first tone and from a second one of the plurality of acoustic transducers the second tone, the tone audio output external to the one side of the secure access device”.
(Emphasis added.)

Additionally, independent claim 18 now more clearly and distinctly recites “the secure access device being of size and form for convenient carrying and use by a user”.

Support for the amended claim language is similar to that already discussed above with respect to the amendment to independent Claim 21 and to independent Claim 1. Support for the amended claim language may be found in the original patent application, as filed. For example, see the specification, on page 8, line 24, to page 9, line 2, (discussing the secure access card being preferably constructed with ISO thickness and with a credit card form factor to enhance the friendly usability by a user typically accustomed to carrying cards in a wallet or purse). Also, see page 10, lines 12-14, (discussing that the card's tone generator can generate multiple tones, such for DTMF communications over a phone line). Further, see page 11, lines 9-17, (discussing how each of the acoustic transducers in a plurality of acoustic transducers is controlled to generate from the plurality of acoustic transducers a variable tone sequence), and continuing on page 11, line 19, to page 12, line 4, (generally discussing the tone audio output from the plurality of acoustic transducers being oriented external from one side of the card and thereby audio coupled to the

receiver mouthpiece of a telephone). No new matter was added by the above amendment.

As has been already discussed above with respect to amended independent Claims 1 and 21, neither the teachings of the Mark reference, nor the Hersh reference, nor the Pieterse reference, nor the Maes reference, nor any arguable combination with any of the cited references, teaches or suggests, the amended claim language as recited for amended independent Claim 18 when taken as a whole. Note especially that Claim 18, similarly to Claim 21, recites that “generating, from a first one of the plurality of acoustic transducers the first tone and from a second one of the plurality of acoustic transducers the second tone, the tone audio output external to the one side of the secure access device”. This is a particularly novel and non-obvious feature of the presently claimed invention as has already been discussed above. Therefore, in view of the amendment and remarks above, Applicant respectfully submits that the Examiner’s rejection should be withdrawn and that Claim 18 is in condition for allowance.

**Rejection under 35 U.S.C. §103(a) over Mark, Hersh, Maes, and
Fung (Claims 19-20)**

(29-30) The Examiner rejected Claims 19-20 under 35 U.S.C. § 103(a) as being unpatentable over Mark in view of Hersh, and further in view of Pieterse, and further in view of Maes, and furthermore in view of Fung.

Claim 20 was canceled without prejudice. As already discussed above, independent Claim 18, from which Claim 19 depends, has been amended in order to more clearly and distinctly claim the Applicant’s invention.

For the reasons discussed above with respect to amended independent Claim 18, dependent Claim 19 also distinguishes over the teachings of the Mark reference,

the Hersh reference, the Pieterse reference, the Maes reference, and the Fung reference, and any arguable combination with any cited reference. Neither of the cited references above, nor any arguable combination thereof, teaches, anticipates, or suggests, all of the recited elements of dependent Claim 19 taken as a whole. Therefore, Applicant respectfully submits that the Examiner's rejection should be withdrawn and that dependent Claim 19 is in condition for allowance.

CONCLUSION

The foregoing is submitted as full and complete response to the Official Action mailed January 27, 2005, and it is submitted that Claims 1-19 and 21-22 are in condition for allowance. Reconsideration of the rejections is requested. Allowance of Claims 1-19 and 21-22 is earnestly solicited.

The present application, after entry of this amendment, comprises twenty-one (21) claims, including four (4) independent claims. Applicant has previously paid for twenty-one (21) claims including four (4) independent claims. Applicant, therefore, believes that an additional fee for claims amendment is currently not due.

If the Examiner believes that there are any informalities that can be corrected by Examiner's amendment, or if it would help expedite the prosecution of this application in any way, a telephone call to the undersigned at (561) 989-9811 is respectfully solicited.

The Commissioner is hereby authorized to charge any fees that may be required or credit any overpayment to Deposit Account **50-1556**.

In view of the preceding discussion, it is submitted that the claims are in condition for allowance. Reconsideration and re-examination is requested.

Respectfully submitted.

Dated: March 28, 2005

By: _____

A handwritten signature in black ink, appearing to read "Jose Gutman", written over a horizontal line.

Jose Gutman
Reg. No. 35,171
Attorney for Applicant

Fleit, Kain, Gibbons, Gutman,
Bongini & Bianco P.L.
551 N.W. 77th Street, Suite 111
Boca Raton, FL 33487
Tel. (561) 989-9811
Fax (561) 989-9812